

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
JOSEPH GARRISON, :
:
Defendant. :
:
----- X

INFORMATION

23 Cr. ____ ()

23 CRIM 597

COUNT ONE
(Conspiracy to Commit Computer Intrusions)

The United States Attorney charges:

1. In or about November 2022, in the Southern District of New York and elsewhere, JOSEPH GARRISON, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 1030(a)(2)(C) and 1030(a)(4).

2. It was a part and an object of the conspiracy that JOSEPH GARRISON, the defendant, and others known and unknown, would and did intentionally access a computer without authorization, and exceed authorized access, and thereby would and did obtain information from a protected computer, which was committed for purposes of commercial advantage and private financial gain, and the value of the information obtained would and did exceed \$5,000, in violation of Title 18, United States Code, Sections 1030(a)(2)(C), 1030(c)(2)(B)(i) & (iii).

3. It was a part and an object of the conspiracy that JOSEPH GARRISON, the defendant, and others known and unknown, knowingly and with the intent to defraud, would and did access a protected computer without authorization, and exceed authorized access, and by

means of such conduct further the intended fraud and obtain anything of value totaling more than \$5,000 during a one-year period, in violation of Title 18, United States Code, Sections 1030(a)(4) and 1030(c)(3)(A).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 18, 2022, JOSEPH GARRISON, the defendant, used leaked credentials to access victims' electronic betting accounts on a fantasy sports and sports betting website (the "Betting Website").

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Information, JOSEPH GARRISON, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1030(i), any and all property, real or personal, constituting or derived from, any proceeds obtained directly or indirectly, as a result of said offenses, and any and all personal property that was used or intended to be used to commit or to facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

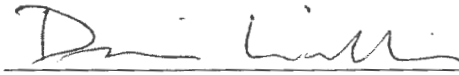
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1030;
Title 21, United States Code, Sections 853; and
Title 28, United States Code, Section 2461.)

A handwritten signature in dark ink, appearing to read 'D. Williams', is written over a horizontal line.

DAMIAN WILLIAMS
United States Attorney
Southern District of New York